

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JAMES ROBINSON,

On behalf of himself and all others similarly situated,

Plaintiff,

v.

NATIONAL STUDENT CLEARINGHOUSE,

Defendant.

Civil Matter No. 1:19-cv-10749

CLASS ACTION COMPLAINT

JOINT STATUS REPORT

1. On August 15, 2019, plaintiff filed notice of a class action settlement (Doc. 17).
2. On August 15, 2019, the Court entered an order requiring the parties to submit a joint status report on or before September 20, 2019 (Doc. 18).
3. On September 20, 2019, the parties submitted a joint status report to inform the Court that the parties were reviewing and discussing drafts of the settlement agreement and all of the necessary exhibits (Doc. 20). In that status report, the parties stated that, by October 21, 2019, it would either file a motion for preliminary approval of a proposed settlement, or a status report documenting the status of the agreement and a proposed timeline for filing the motion for preliminary approval.
4. The parties apologize to the Court for this late filing. The parties have continued to negotiate the final details of the settlement since the September 20, 2019 status report and had hoped to come to full agreement on the terms before providing this next status update. The parties are still negotiating over the final details and discussing drafts of the settlement agreement and all the necessary exhibits.

5. The parties require additional time to finish this process.
6. The parties recommend that the Court direct that a Motion to Direct Notice to the Class be filed on or before December 31, 2020.
7. This length of time should give the parties enough time to come to full agreement on all the details of the settlement, finalize the settlement agreement and the necessary exhibits, and draft and finalize the motion.

Respectfully submitted,

JAMES ROBINSON,

By his attorneys,

/s/Stuart T. Rossman

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Respectfully submitted,

NATIONAL STUDENT

CLEARINGHOUSE

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent via U.S. first class mail to those indicated as non-registered participants on November 8, 2019.

/s/Stuart T. Rossman BBO #430640